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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LA ALLIANCE FOR HUMAN
RIGHTS, an unincorporated
association, JOSEPH BURK,
HARRY TASHDJIAN, KARYN
PINSKY, CHARLES MALOW,
CHARLES VAN SCOY, GEORGE
FREM, GARY WHITTER, and
LEANDRO SUAREZ, individuals,

Plaintiffs,

v.

CITY OF LOS ANGELES, a
municipal entity; COUNTY OF LOS
ANGELES, a municipal entity; and
DOES 1 through 200 inclusive,

Defendants.

Case No. 2:20-cv-02291 DOC-KES

STATUS CONFERENCE REPORT

Date: March 19, 2020
Time: 10:00AM
Ctrm: 350 W. 1st Street
Los Angeles, CA 90012
Courtroom 1

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR
ATTORNEYS OF RECORD:**

Plaintiffs hereby submit the following Report in advance of the status
conference scheduled for March 19, 2020:

1 Plaintiffs understand and appreciate that this crisis is unfolding rapidly.
 2 The County and City are juggling a tremendous amount and significant efforts
 3 have gone into managing competing interests while maintaining public health to
 4 the extent possible. Plaintiffs thank and commend the County and City for their
 5 tremendous work, and submit this status report to identify issues that remain a
 6 priority for Plaintiffs.

7 **Permanent/Interim Solutions**

8 After the COVID-19 pandemic has abated, the homeless crisis will remain,
 9 and as the Court as noted, there needs to be a plan in place to resettle individuals
 10 who are in emergency shelters or hotels/motels into a more sustainable solution
 11 rather than back on the streets. Those solutions will take time to implement, and
 12 planning for them should begin immediately.

13 According to the City and County Joint Status Report, Docket No. 43,
 14 there are 400 beds set to open in March, and an additional “1,000-plus” interim or
 15 permanent supportive beds planned to open in the next several months. While
 16 the addition of any interim and permanent beds is welcome, 1,400 beds are less
 17 than 5% of the goal of 60% of unsheltered beds in the County.

18 In response to the Court’s requirement that the City evaluate whether it is
 19 going to accept the modular housing model proposal presented by the Court on
 20 March 19, 2020, the City has indicated it is “still collecting information” to
 21 determine whether modular housing is feasible under “state and local building
 22 and fire codes” and it is unclear if they are “certified for occupancy.”

23 The urgency of the homelessness crisis requires a different approach.
 24 Building and code variances can be easily and swiftly granted, particularly during
 25 an emergency. The threshold question is whether the City and County are
 26 prepared to pursue a solution on this scale, immediately. If cost and land are not
 27 an issue for the Defendants, bureaucratic barriers can be overcome through
 28

1 variances and alterations. The Court's willingness to actively facilitate large-
 2 scale solutions presents a unique and powerful opportunity—the Defendants must
 3 decide whether they are prepared to seize that opportunity.

4 There are other, low-cost solutions exist which would fit within the same
 5 parameters, but these, too, would require immediate planning and
 6 implementation¹:

- 7 - SHARE! collaborative housing can begin to scale up immediately for
- 8 \$4,000 per bed.
- 9 - Tiny houses may be used to create small, medium, or larger villages, at
- 10 a cost of approximately \$5,000 per bed.
- 11 - 3D printed homes can be produced in 24 hours and cost \$4,000 per
- 12 home.

13 **Hotel/Motel Rooms**

14 Plaintiffs have undertaken significant efforts to secure the leasing of
 15 hotel/motel rooms, but the County, which is facilitating the funding for this
 16 effort, has yet to close key deals. A broker has sent a master lease and indicated
 17 that if terms could be reached, over 30 hotels would be willing to participate, and
 18 likely more. Plaintiffs sent the master lease and concerned terms to the County
 19 the morning of March 25 and connected the County with the relevant brokers. As
 20 of the time of this filing, no further action has been taken. Plaintiffs request this
 21 Court discuss with the County, and potentially the broker if the Court deems it
 22 appropriate, to determine whether an acceptable deal may be reached as soon as
 23 possible.

24 //

25 //

27
 28 ¹ Hard copies of all options and proposals, including contact information, will be
 available at the March 26, 2020 hearing.

1 **Emergency Shelters**

2 As of the March 24, 2020 hearing, eight temporary shelters had been
 3 opened in recreation centers throughout the city. Yet the City noted it has the
 4 “capability” to open “up to 42” shelters “based on need.” All parties agree that
 5 the need exists, yet is it unclear when, if ever, the remaining shelters will be
 6 opened.

7 Furthermore, while Plaintiffs appreciate and applaud efforts to include only
 8 those exhibiting symptoms consistent with COVID-19 in the emergency shelters,
 9 it is unclear how many, if any, individuals have demonstrated positive symptoms
 10 and have been taken to quarantine locations and how many, if any, have refused
 11 quarantine and what has happened with those individuals.

12 **Conclusion**

13 Plaintiffs are heartened by the City’s and County’s efforts to support and
 14 assist the homeless during the COVID-19 crisis. This crisis has underscored the
 15 vulnerability of the homeless population, and the urgent need for action on behalf
 16 of the unsheltered. Plaintiffs remain focused on the longer-term goal of
 17 providing sustainable shelter and services for the homeless and securing clean
 18 and safe streets for the benefit of all.

19
 20 Dated: March 25, 2020

/s/ Matthew Donald Umhofer

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